

Jonathan R. Lagarenne
Cali R. Spota
FOX ROTHSCHILD LLP
997 Lenox Drive
Lawrenceville, NJ 08648-2311
Telephone: 609-896-3600
Facsimile: 609-896-1469
JLagarenne@foxrothschild.com
CSpota@foxrothschild.com

Attorneys for Defendant Absolute Coatings, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RENEX NY CORP.,

Plaintiff,

v.

SUPPLY DEPOT LLC, MATEUS
ZIMA, ABSOLUTE COATINGS,
INC., and POLYCARE SUPPLY
GROUP LLC,

Defendants.

Case No.: 2:23-cv-00489-WJM-JRA

**NOTICE OF DEFENDANT
ABSOLUTE COATINGS, INC.'S
MOTION FOR SANCTIONS FOR
PLAINTIFF'S AND PLAINTIFF'S
COUNSEL'S VIOLATION OF
FED. R. CIV. P. 11**

Return Date: June 5, 2023
(Electronically Filed)

PLEASE TAKE NOTICE that on June 5, 2023, or as soon thereafter as counsel can be heard, the undersigned counsel for Absolute Coatings, Inc. ("Absolute") shall move before the Honorable William J. Martini, U.S.D.J., at the Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, New

Jersey for the entry of an Order sanctioning Plaintiff Renex NY Corp. (“Renex”) and Renex’s counsel under Federal Rule of Civil Procedure 11 by dismissing all claims against Absolute with prejudice, holding Plaintiff and Plaintiff’s counsel jointly responsible for the payment, in an amount to be determined at a later date, of Absolute’s attorneys’ fees and costs that Absolute has incurred defending against these objectively unreasonable claims, and such other and further relief the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendant Absolute Coatings, Inc. will rely upon its Brief in Support of its Motion and the Declarations of Jonathan R. Lagarenne, Esq., and Cali R. Spota, Esq., along with exhibits appended thereto, submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Dated: May 1, 2023

/s/ Cali R. Spota
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*Attorneys for Defendant Absolute
Coatings, Inc.*